

1. On or about August 4, 2017 Plaintiff Oppenheimer & Co., Inc. (“Oppenheimer”) commenced this action against DocuLynx in the Supreme Court of the State of New York, County of New York, Index No. 655204/2017 by filing a Summons and Complaint and proposed Order to Show Cause, and supporting papers. Plaintiff’s Summons and Complaint and proposed Order to Show Cause and supporting papers comprise the entirety of all process, pleadings and orders transmitted to the Defendant and are attached as Exhibit A pursuant to

28 U.S.C. § 1446(a).

2. The United States District Court for the Southern District of New York embraces the place where the above-captioned action is present.

3. Doculynx received a copy of the Summons and Complaint in the above-captioned action on or about August 4, 2017. This Notice of Removal is signed pursuant to Fed. R. Civ. P. 11 and is filed with this Court within 30 days of receipt by Doculynx by service or otherwise of a copy of the initial pleading, as required by 28 U.S.C. § 1446(a).

4. Upon information and belief, no other parties have been joined and served as Defendants in this action.

5. This Notice of Removal is signed pursuant to Fed. R. Civ. P. 11 and is filed with this Court within 30 days of Defendant's receipt of the Summons and Complaint, as required by 28 U.S.C. §1446(b).

6. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1332 in that it is between citizens of different States and, the matter in controversy exceeds the sum or value of \$75,000 exclusive of interest and costs.

7. Upon information and belief, Oppenheimer is a corporation organized under the laws of the State of New York with its principal place of business located in New York, New York.

8. Doculynx is a Nebraska corporation with its principal place of business located in Ralston, Nebraska.

9. In its Complaint, Plaintiff alleges causes of action for breach of contract and conversion. It also seeks a temporary restraining order and permanent injunction.

10. Plaintiff's Complaint does not specify an amount of damages sought in


this action. However, based on the allegations of the Complaint and Doculynx's knowledge of the contract at issue, the value of services provided and at issue, Plaintiff's claims exceed the jurisdictional sum or value of \$75,000 exclusive of interest and costs.

11. Written notice of the filing of this Notice of Removal will be provided to counsel for Plaintiff and a copy will be filed in the Supreme Court for the State of New York, County of New York, as required by 28 U.S.C. § 1446(d).

**WHEREFORE**, Defendants respectfully request that the above action now pending against it in the Supreme Court for the State of New York, County of New York, be removed therefrom to this Court.

Dated: New York, New York  
August 7, 2017

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